

FROM

(FRI) 12. 21' 07 12.26/ST. 12 25/NO 4863512383 P 2

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***ALSO ADMITTED IN THE DISTRICT OF COLUMBIA**

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
ORANGE COUNTY
714 634-6208
7201 DEC 26 A 11:07

December 21, 2007

**Federal Election Commission
999 E Street, NW
Washington, DC 20463**

Re MUR 5955

**RESPONSE BY RESPONDENTS MICHAEL RAMSEIER, JANIE RAMSEIER,
STEVE MELODY, JOAN MELODY, AND ROSARIO CHAVEZ**

On or about December 10, 2007, each of the above named individuals received a letter from Jeff Jordan notifying them that they had been named in a complaint filed with the Federal Election Commission. The respondents hereby request that no action be taken against them in response to the complaint.

Factual Background

Michael Ramseier, Steve Melody, and Rosario Chaver ("employee respondents") are employees of WellPoint, Inc. Janie Ramseier is the wife of Michael Ramseier and Joan Melody is the wife of Steve Melody.

On May 1 and May 2, 2007, the employee respondents attended a Latino Coalition conference in Washington, DC on behalf of WellPoint. Rudy Giuliani was scheduled to speak at the conference. Janie Ramseier and Joan Melody did not accompany their spouses to Washington, DC.

The employee respondents' supervisor, Jose "Josh" Valdez, requested that they attend a private event on May 1, 2007 that would allow them to meet Mr. Giuliani. When the request was made, the employee respondents were not told that the private event was a fundraiser for the Rudy Giuliani Presidential Committee.

Upon arriving at the private Giuliani event, the employee respondents were instructed to contribute to the Giuliani campaign. Also, Mr. Valdez instructed Mr. Ramseier and Mr. Melody to contribute on behalf of their spouses.

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All three employee respondents initially refused to make contributions and protested that they did not wish to contribute to the Giuliani campaign.

Mr. Valdez informed each employee respondent that he would personally reimburse them for their contributions. None of the respondents was aware that permitting their names to be used by Mr. Valdez to make contributions was potentially illegal. Further, Mr. Valdez assured the employee respondents that it was permissible to have their names used in making a contribution.

In September 2007, WellPoint interviewed the employee respondents regarding the circumstances surrounding this event.

The respondents have fully cooperated with WellPoint during its investigation of this matter, and they similarly intend to cooperate with the FEC.

No violation of the Federal Election Campaign Act has been alleged

The complaint does not allege that the above named respondents have violated the Federal Election Campaign Act ("FECA," "the Act").

FECA prohibits the making of a contribution in the name of another. In addition, the Act states that "no person shall knowingly permit his name to be used to effect such a contribution" (emphasis added) 2 U.S.C. 441f. The employee respondents in this matter did not permit their names to be used to effect a contribution made in the name of another. Rather, they were required by their supervisor to engage in activities with which they disagreed. An individual who is required to participate in a potentially illegal scheme cannot be held liable for his or her action. This individual is more properly described as a victim or a witness. This is particularly true in this case, in which the respondents have consistently and truthfully detailed the misconduct by Mr. Valdez and are willing to continue to cooperate in any investigation conducted by the FEC.

Because no violation of FECA has been alleged, the Commission should take no further action against any of the above named respondents.

Any alleged violations do not warrant the use of the Commission's limited resources

Even if the violations alleged in the complaint are true, they are not significant enough to warrant the use of the Commission's limited resources.

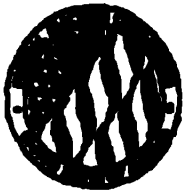
It has been alleged that the respondents allowed their names to be used to effect a contribution made in the name of another. However, upon discovering that their actions were potentially unlawful, the respondents immediately acted to reverse any wrongdoing. The respondents cooperated fully with the WellPoint investigation and were instrumental in communicating the facts to the Giuliani campaign.

The respondents agree to cooperate and provide testimony and additional evidence regarding these events to the Commission. Given the cooperation of the respondents and their actions, the further investigation of the respondents is not warranted.

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FROM

(FRI) 12 21 '07 12.26/ST 12.25/NO 4863512383 P 4



FEDERAL ELECTION COMMISSION

**800 E Street, NW
Washington, DC 20463**

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client
FAX (202) 219-3923

MUR # 5955

NAME OF COUNSEL Dana W. Reed, Daniel E. Abraham

FIRM Reed & Davidson, LLP

ADDRESS 520 South Grand Avenue, Ste 700

Los Angeles, CA 90071-2665

TELEPHONE- OFFICE (213) 624-6200

FAX (213) 623-1692

The above-named individual and/or firm is hereby designated as my
counsel and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission

12/20/07 [Signature] vice president
Date Respondent/Client Signature Title

RESPONDENT/CLIENT: Mr. Mike Ransier

MAILING ADDRESS _____
(Please Print)

11001aron, CO 80127

TELEPHONE- HOME _____
BUSINESS (303) 514-1457 303-517-7457

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437(g)(4)(B)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

10044273119

FROM

(FRI) 12 21 '07 12:26/ST 12 25/NO 4863512383 P 5



FEDERAL ELECTION COMMISSION
988 E Street, NW
Washington, DC 20485

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client
FAX (202) 219-9822

MUN # 5855

NAME OF COUNSEL Dana W. Reed, Daniel E. Abraham

FIRM Reed & Davidson, LLP

ADDRESS 520 South Grand Avenue, Ste 700

Los Angeles, CA 90071-2664

TELEPHONE- OFFICE (213) 624-6200

FAX (213) 623-1682

The above-named individual and/or firm is hereby designated as my
counsel and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission

12/20/07
Date

[Signature]
Respondent/Client Signature

Title

RESPONDENT/CLIENT: Mrs. Janis Ramirez

MAILING

ADDRESS _____

(Please Print)

Irrelaton, CO 80127

TELEPHONE- HOME (_____) _____

BUSINESS (303) 303-7457

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437(g)(1)(2)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Rev 7988

10044273120

FROM

(FRI) 12 21 '07 12 26/ST 12 25/NO 4863512383 P 6



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client.
FAX (202) 218-3828

MUR # 5955

NAME OF COUNSEL Dana W. Reed, Daniel X. Abramson

FIRM Reed & Davidson, LLP

ADDRESS 520 South Grand Avenue, Ste 700

Los Angeles, CA 90071-2665

TELEPHONE- OFFICE (213) 624-6200

FAX (213) 623-1692

The above-named individual and/or firm is hereby designated as my
counsel and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission

12-20-07
Date

[Signature]
Respondent/Client Signature

Title

RESPONDENT/CLIENT: Mr. Steve Malody

MAILING
ADDRESS _____
(Please Print)

Elk Grove, CA 95758

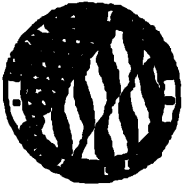
TELEPHONE- HOME (_____) _____

BUSINESS (916) 838-7555

Information is being sought as part of an investigation being conducted by the Federal Election
Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section
prohibits making public any investigation conducted by the Federal Election Commission without
the express written consent of the person under investigation.

Rev 2006

10044273121



STATEMENT OF DESIGNATION OF COUNSEL.
Please use one form for each Respondent/Client.
FAX (202) 219-9228

Rev 2005

10044273122

FROM
FBI

(FRI) 12 21 07 12:27/ST 12 25/NO 4863512383 P 8
(WED) 12 19 07 10 50/ 10.49/NO 4863512362 P 4



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Client.
FAX (202) 218-9622

MUR # 5955

NAME OF COUNSEL John E. Reed, Daniel E. Alvarado

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ADDRESS 520 South Grand Avenue, Ste 700

Los Angeles, CA 90071-2665

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FAX (213) 623-1492

The above-named individual and/or firm is hereby designated as my
counsel and is authorized to receive any notifications and other communications
from the Commission and to act on my behalf before the Commission.

12-19-07
Date

[Signature]
Respondent/Client Signature

Title

RESPONDENT/CLIENT: Rosario Chavez

MAILING

ADDRESS

(Please Print)

Agoura Hills, CA 91301

TELEPHONE- HOME ()

BUSINESS ()

Information is being sought as part of an investigation being conducted by the Federal Election
Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(1)(A) apply. This section
prohibits making public any investigation conducted by the Federal Election Commission without
the express written consent of the person under investigation.

Rev 2005

10044273123